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May 9, 2025

BY E-MAIL AND ECF
The Honorable Victor Marrero
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Raul Martinez, 23 Cr. 183

Dear Judge Marrero:

Defendant, Mr. Raul Martinez, has a pending indictment before this Court charging him inter-alia with Assisting in the preparation of False Tax Returns under Title 26, USC, Section 7206(2). On August 24, 2023 Mr. Martinez was released on a \$50,000 personal recognizance bond co-signed by his wife and which has the usual conditions associated with his release. The matter is next scheduled for a June 6, 2025 Sentencing. From the very inception of this case, Mr. Martinez has complied with all the conditions of his release.

The purpose of this writing is to respectfully request this Court to permit Mr. Martinez to travel with his wife to the State of Virginia and Pennsylvania on the following dates:

1. Dates: 05/22/2025 to 05/26/2025
Place where he will be staying: Staybridge Suites Charlottesville Airport by IHG
Address: 3060 Laurel Park Lane, Charlottesville, VA 22936
Telephone: 866-944-8091
2. Dates: 05/30/2025 to 06/01/2025
Place where he will be staying: Staying with a friend, Rose Biondi
Address: 742 River Road, Milanville, PA 18443
Telephone: 917-405-8957

The reason for Mr. Martinez's travel to Virginia is to celebrate the birthday of an infant turning one. The reason for Mr. Martinez's travel to Pennsylvania is to visit a friend.

Mr. Martinez is currently under the supervision of U.S. Pretrial Services Officer Laron M. Day who works in the District of New Jersey. When contacted for the purpose of obtaining his consent for the travel, P.O Laron indicated that neither he, nor the Pretrial Services Officer in New York, had any objections to the request. The following is the contact information for officer Laron:

Laron M. Day
U.S Pretrial Services Officer
District of New Jersey
973-681-6589 (phone)
973-645-2282 (fax)
Email: Laron_Day@njpt.uscourts.gov

Furthermore, the undersigned respectfully requests this Court to adjourn the sentencing hearing scheduled for June 6, 2025 at 11:00AM to any day after June 17, 2025 that is acceptable to the Court. The reason for this request to adjourn the sentencing is that the undersigned had previously planned and booked a vacation trip outside of the country from June 5 through June 16 wrongly assuming that Mr. Martinez's sentencing would take place in May.

AUSA Margaret Lynaugh who is prosecuting this matter has indicated that she has no objection to travel request or to the adjournment.

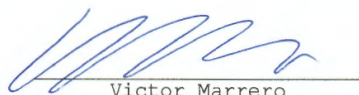
Thank you in advance for the Court's consideration of defendant's request to travel and to adjourn the sentencing hearing to a date as requested herein.

Respectfully submitted,
/s/
Heriberto Cabrera, Esq

Cc: by email: Laron M. Day
U.S Pretrial Services Officer
District of New Jersey
Laron_Day@njpt.uscourts.gov

Request **GRANTED**. The Court hereby grants the Defendant's request to modify the conditions of his bail to permit travel to Virginia and Pennsylvania on the dates specified above. The Court also grants the Defendant's adjournment request. The sentencing scheduled on June 6, 2025, is hereby adjourned to June 27, 2025, at 2:00 pm. Defense counsel is advised that no further adjournments will be considered.

SO ORDERED.


Victor Marrero
U.S.D.J.

Dated: May 12, 2025